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Attorney for Plaintiff,
Dr. Anna Vertkin

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

DR. ANNA VERTKIN)	CASE NO: C 07-04471 SC
)	
)	
Plaintiff,)	PLAINTIFF'S INITIAL DISCLOSURES
)	PURSUANT TO RULE 26
v.)	
)	
MICHAEL VERTKIN and DOES 1-20)	
)	
Defendants)	

COMES NOW plaintiff, DR. ANNA VERTKIN, files the initial disclosures required by F.C.R.P. 26(a) at the time of the Joint Scheduling Conference or within 14 days thereafter, as required by the rules of the Court

A. F.C.R.P. 26(a)(1)(A)

Plaintiff identifies the following persons and legal entities that he believes to have knowledge regarding the matters that are the subject of this lawsuit:

1. Plaintiff, Dr. Anna Vertkin
2. Defendant, Michael Vertkin
3. Agent for Best buy/Geek squad, Marin City
4. Agent for Forensic Computer Service
5. Agent for E*Trade Financial Services

1 6. Building Manager, Virginia Gilbert

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3 Plaintiff is in the process of locating said witnesses and will provide their addresses and
4 other pertinent information as they are found. Plaintiff reserves the right to identify and discover
5 further witnesses.

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7 **B F.C.R.P. 26(a)(1)(B)**

- 8 1. Computer recovery records dated January 2007.
9 2. Copies of E*Trade Account information for September 2006, and October 2006.
10 3. Copies of Well Fargo Bank Account #2934323466 reflecting activities from
11 September 2006 through October 2006.

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13 Plaintiff is in the process of locating said information and will provide copies to the
14 Defendant as they are located. Plaintiff reserves the right to include such information as it
15 becomes available through further disclosure or discovery.

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17 **C. F.C.R.P. 26(a)(1)(C)**

18 Plaintiff is seeking damages allowed under the 42 U.S.C. 1301C (1177) for violation of
19 her rights in amount not less than \$100,000.00 to be determined by a jury at trial. Additionally,
20 plaintiff seeks relief in the amount of \$500.00 per violation for violations of 18 USC 2511(A),
21 (C). Plaintiff is also seeking damages allowed under the 18 U.S.C. 1001 to be determined by a
22 jury at trial in its fair and enlightened conscience. Further, plaintiff is seeking damages and
23 statutory damages allowed under California State Tort law for trespass to chattel, and invasion of
24 privacy- intrusion of solitude. Plaintiff seeks special damages to be determined by proof to
25 account for all future wage earning. Plaintiff is also seeking compensatory damages under state
26 law for the claims plead in this lawsuit, and plaintiff will make an election of remedies or
27 damages after entry of verdict by the jury and before entry of judgment by the Court. Plaintiff
28 seeks punitive damages at the rate of three times the amount of compensatory and special

1 damages awarded. Plaintiff is seeking costs in this matter to be determined as this case proceeds,
2 and attorney's fees in an amount not less than \$300.00 per hour for the time of plaintiffs counsel,
3 Robert L. Shepard.

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5 **D. F.C.R.P. 26(a)(1)(D)**

6 Plaintiff is unaware of whether any defendant herein is covered by insurance and
7 defendants' counsel has not disclosed such information.

8
9 WHEREFORE, plaintiff files the above initial disclosures prior to or within 14 days of
10 the Joint Scheduling Conference as required by F.R.C.P. 26(f). As additional information is
11 obtained during the course of discovery in this case, and through the receipt of information from
12 third parties, plaintiff and her counsel will supplement and amend her initial disclosures,
13 including the identification of documents, parties, and other information in the consolidates
14 pretrial order that is required by this Court.

15 Dated: November 26, 2007

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18 Respectfully submitted,

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21 /s/ Robert L. Shepard 197240

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23 **ROBERT L. SHEPARD**
24 Attorney for Plaintiff Dr. Anna Vertkin
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